

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

)	
INA STEINER, DAVID STEINER, and)	
STEINER ASSOCIATES, LLC,)	
)	Civil Action No. 21-CV-11181-PBS
Plaintiffs,)	
)	
v.)	
)	
EBAY INC., et al.,)	
)	
Defendants.)	
)	

DEFENDANT EBAY INC.'S UNOPPOSED MOTION TO SEAL

Defendant eBay Inc. (“eBay”) hereby moves, unopposed and pursuant to Local Rule 7.2, for leave to file under seal its forthcoming Motion to Compel Plaintiffs’ Initial Disclosures, along with its supporting Memorandum of Law and exhibits.

As grounds for this motion, eBay states as follows:

1. eBay and Plaintiffs have an ongoing dispute concerning Plaintiffs’ Initial Disclosures, Supplemental Initial Disclosures, and Second Supplemental Initial Disclosures (together, the “Disclosures”), which eBay contends lack several important categories of information required by Rule 26(a)(1). eBay intends to file a motion to compel Plaintiffs to supplement their Disclosures to provide the categories of information and documents sought by eBay.

2. eBay's motion will attach and necessarily discuss the substance of Plaintiffs' Disclosures.

3. Plaintiffs have designated each of their Disclosures, in their entirety, as either “Highly Confidential” or “Confidential.”

4. eBay disagrees with Plaintiffs' blanket designation of these materials as

confidential, and disagrees that any of the information at issue in eBay's forthcoming motion to compel is confidential. However, pursuant to the Protective Order dated October 19, 2023, eBay must file these materials under seal. *See* Protective Order § 13.5. (ECF No. 278)

WHEREFORE, eBay respectfully requests that the Court allow this motion to permit the filing of eBay's Motion to Compel Plaintiffs' Initial Disclosures under seal.

Dated: December 27, 2023

Respectfully submitted,

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo

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Counsel for eBay Inc.

CERTIFICATION PURSUANT TO L.R. 7.1(a)(2)

I, Jack W. Pirozzolo, counsel for eBay, hereby certify that, in accordance with Local Rule 7.1(a)(2), counsel for eBay conferred with counsel for Plaintiffs on December 20, 2020, who do not oppose the relief requested in this motion.

Dated: December 27, 2023

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo

CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2023, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants. An email copy was sent to *pro se* defendant Stephanie Stockwell.

Dated: December 27, 2023

/s/ Jack W. Pirozzolo
Jack W. Pirozzolo